

HellerEhrman_{LLP}

March 10, 2006

Via E-mail

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John B. Wyss, Esq.
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**Re: Inline Connection Corp. v. Verizon Internet Services Inc., et al.,
Case No. 2:05 CV 205 (HCM)**

Dear John:

Thank you for your March 9 letter concerning Mercury Communication/Pi-Squared related documents.

To be clear, we have not “refused” production of such documents. We simply believe their production can and should be taken up when the parties are proceeding with full-scale bilateral discovery. As you know from Inline’s motion to stay, moreover, we believe this should occur *after* the *AOL* and *Earthlink* cases have been resolved. Indeed, it seems likely that any ownership issue will be litigated in *AOL/Earthlink*, which may allow Inline and Verizon to address that issue in a streamlined fashion.

With regard to the last paragraph of your letter, I do not know what you mean by “proceed in good faith reliance on the public record description of those documents.” Heller was not present at the hearing you reference, but I am willing to bet we would disagree on what exactly was said about those documents at that hearing. In any event, the ownership of the patents is what it is, and we do not agree that any statement made at that hearing can alter or change the actual ownership of the patents. Nor do we agree that Verizon can “rely” on some unspecified interpretation of what was said at the hearing.

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Sincerely,

A handwritten signature in cursive script, appearing to read "Carl Nadler", written in dark ink.

Carl Nadler

cc: C. Joel Van Over, Esq.

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